

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

Kathleen Ronning-Schimetz,

Plaintiff,

vs.

North Dakota Office of the Adjutant General,  
Clark V. Johnson, in his individual capacity,  
and Stephen P. Herda, in his individual  
capacity,

Defendants.

**UNOPPOSED MOTION FOR  
EXTENSION OF TIME  
TO FILE ANSWER**

**Case No. 1:25-cv-00023**

[¶1] Pursuant to Fed. R. Civ. P. 6(b), Defendants North Dakota Office of the Adjutant General and Stephen Herda (“State Defendants”) request an extension of time to answer Plaintiff Kathleen Ronning-Schimetz’s Complaint. *See* Doc. No. 1. Plaintiff’s Complaint was served on State Defendants on February 6, 2025. Doc. Nos. 5, 6. State Defendants’ Answer is currently due on February 27, 2025. *See* Fed. R. Civ. P. 12(a)(1)(A)(i). State Defendants now request until **April 11, 2025**, to file their Answer.

[¶2] Good cause exists to grant this motion, which is not made for the purposes of delay. By State Defendants’ calculation, the Answer of the remaining Defendant, Clark Johnson, will be due on April 11, 2025, because he was served on February 10, 2025 and he is a federal employee. *See* Fed. R. Civ. P. 12(a)(2). State Defendants would benefit from additional time to prepare their Answer, and submit that this matter would be streamlined if all Answers are due on the same day. State Defendants accordingly request an extension of time until **April 11, 2025**, to file their Answer. Undersigned counsel consulted with counsel for the Plaintiff, who do not oppose this request. For all of these reasons, State Defendants respectfully request that the Court grant their motion.

Dated this 26<sup>th</sup> day of February, 2025.

State of North Dakota  
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